



0000111824

ORIGINAL

RECEIVED

BEFORE THE ARIZONA CORPORATION COMMISSION 4: 27

MARC SPITZER

Chairman

WILLIAM A. MUNDELL

Commissioner

MIKE GLEASON

Commissioner

JEFF HATCH-MILLER

Commissioner

KRISTIN K. MAYES

Commissioner

AZ CORP COMMISSION  
DOCUMENT CONTROL

Arizona Corporation Commission

DOCKETED

JAN 30 2004

DOCKETED BY

IN THE MATTER OF QWEST  
CORPORATION'S COMPLIANCE WITH  
§ 271 OF THE TELECOMMUNICATIONS  
ACT OF 1996

Docket No. T-00000A-97-0238

**QWEST CORPORATION'S STATUS  
REPORT REGARDING  
IMPLEMENTATION OF  
RECOMMENDATIONS IN OSS  
ORDER**

Qwest Corporation ("Qwest") respectfully submits this status report ("Report") regarding its implementation of the recommendations in the Arizona Corporation Commission's (the "Commission" or "ACC") Order regarding Qwest's Operational Support Systems ("OSS").<sup>1</sup>

In the OSS Order, the Commission directed Qwest to provide the Commission with quarterly status reports on its progress in implementing the recommendations contained in paragraphs 145-151 of the order.<sup>2</sup> Qwest has attached two tables to this Report describing the actions Qwest has taken to implement the recommendations: Exhibit A lists the recommendations relating to Qwest's Stand Alone Test Environment ("SATE") and

<sup>1</sup> Order, *In the Matter of U S WEST Communications, Inc.'s Compliance with Section 271 of the Telecommunications Act of 1996*, ACC Docket No. T-00000A-97-0238, Decision No. 66224 (Aug. 28, 2003) ("OSS Order").

<sup>2</sup> Order at 50. Although paragraph 150 was included in the list of paragraphs the Commission ordered Qwest to immediately begin implementing, that paragraph does not contain any recommendations. Instead, it states as follows: "Staff supports the findings and conclusions reached by its Test Administrator, CGE&Y, in its Qwest CMP Re-Design Evaluation dated March 25, 2002, and recommends that the Commission adopt it."

1 Exhibit B lists the remaining recommendations. As set forth below, Qwest has already  
2 implemented all of the recommendations that required action by Qwest except for a single  
3 recommendation that allowed Qwest a year for implementation.

4 **SATE Recommendations**

5 Recommendations relating to SATE are set forth in paragraphs 146, 147, and 149  
6 of the Order.<sup>3</sup> The table in Exhibit A lists each of these recommendations and describes  
7 the action Qwest took to implement them. As set forth in Exhibit A, Qwest has  
8 implemented all of the recommendations.

9 **Other Recommendations**

10 The remaining recommendations are set forth in paragraphs 145, 148, and 151 of  
11 the Order.<sup>4</sup> The table in Exhibit B lists each of these recommendations and describes the  
12 action Qwest took to implement them. The last column, entitled "Status," indicates that  
13 all of the recommendations that require Qwest action have been met except one.  
14 Paragraph 148(c) of the Order lists the following Staff recommendation:

15  
16 Qwest should test its Daily Usage File (DUF) provisioning to CLECs  
17 to ensure accurate and timely delivery of these records. This test  
18 should be conducted within 12 months and be conducted with Staff  
oversight.

19 Qwest has not yet implemented this recommendation. However, by its terms, the  
20 recommendation allows Qwest twelve months for implementation.

21 Thus, as set forth in Exhibits A and B and described above, Qwest has already  
22

23 <sup>3</sup> Hewlett Packard's recommendations from its initial SATE Summary Evaluation Report and SATE New  
24 Release Test Summary Report are set forth in paragraphs 146 and 147, respectively, of the Order. Staff's  
SATE recommendations are set forth in paragraph 149.

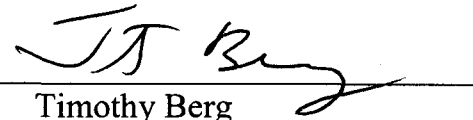
25 <sup>4</sup> Cap Gemini Ernst & Young's ("CGE&Y") recommendations are set forth in paragraph 145. Staff's  
26 recommendations are set forth in paragraph 148 and Staff's CMP recommendations are set forth in  
paragraph 151.

1 implemented all but one of the recommendations in the OSS Order.

2 RESPECTFULLY SUBMITTED this 30<sup>th</sup> day of January 2004.

3 FENNEMORE CRAIG

4  
5 BY



6 Timothy Berg  
7 Theresa Dwyer  
8 3003 North Central Avenue  
9 Suite 2600  
10 Phoenix, AZ 85012-2913  
(602) 916-5421  
(602) 916-5999 (fax)

11 ORIGINAL and 13 copies hand-delivered for  
12 filing this 30<sup>th</sup> day of January, 2004 to:

13 Docket Control  
14 ARIZONA CORPORATION COMMISSION  
15 1200 W. Washington St.  
16 Phoenix, AZ 85007

17 COPY of the foregoing hand delivered  
18 this 30<sup>th</sup> day of January, 2004 to:

19 Maureen A. Scott  
20 Legal Division  
21 ARIZONA CORPORATION COMMISSION  
22 1200 W. Washington St.  
23 Phoenix, AZ 85007

24 Ernest G. Johnson, Director  
25 Utilities Division  
26 ARIZONA CORPORATION COMMISSION  
1200 W. Washington St.  
Phoenix, AZ 85007

1 Lyn Farmer, Chief Administrative Law Judge  
2 Jane Rodda, Administrative Law Judge  
3 Hearing Division  
4 ARIZONA CORPORATION COMMISSION  
5 1200 W. Washington  
6 Phoenix, AZ 85007

7 COPY of the foregoing mailed  
8 this 30<sup>th</sup> day of January, 2004 to:

9 Eric S. Heath  
10 SPRINT COMMUNICATIONS CO.  
11 100 Spear Street, Suite 930  
12 San Francisco, CA 94105

13 Thomas Campbell  
14 LEWIS & ROCA  
15 40 N. Central Avenue  
16 Phoenix, AZ 85004

17 Joan S. Burke  
18 OSBORN MALEDON, P.A.  
19 2929 N. Central Ave., 21st Floor  
20 PO Box 36379  
21 Phoenix, AZ 85067-6379

22 Thomas F. Dixon  
23 WORLDCOM, INC.  
24 707 N. 17th Street #3900  
25 Denver, CO 80202

26 Scott S. Wakefield  
RUCO  
1110 West Washington, Suite 220  
Phoenix, AZ 85007

Michael M. Grant  
Todd C. Wiley  
GALLAGHER & KENNEDY  
2575 E. Camelback Road  
Phoenix, AZ 85016-9225

1 Michael Patten  
2 ROSHKA, HEYMAN & DEWULF  
3 400 E. Van Buren, Ste. 900  
4 Phoenix, AZ 85004-3906  
5  
6 Mark DiNuzio  
7 COX COMMUNICATIONS  
8 20402 North 29th Avenue  
9 Phoenix, AZ 85027-3148  
10  
11 Daniel Waggoner  
12 DAVIS, WRIGHT & TREMAINE  
13 2600 Century Square  
14 1501 Fourth Avenue  
15 Seattle, WA 98101  
16  
17 Traci Grundon  
18 DAVIS, WRIGHT & TREMAINE  
19 1300 S.W. Fifth Avenue  
20 Portland, OR 97201  
21  
22 Richard S. Wolters  
23 Maria Arias-Chapleau  
24 AT&T Law Department  
25 1875 Lawrence Street, #1575  
26 Denver, CO 80202  
27  
28 Diane Bacon, Legislative Director  
29 COMMUNICATIONS WORKERS OF AMERICA  
30 5818 N. 7th St., Ste. 206  
31 Phoenix, AZ 85014-5811  
32  
33 Philip A. Doherty  
34 545 S. Prospect Street, Ste. 22  
35 Burlington, VT 05401  
36  
37 W. Hagood Bellinger  
38 4969 Village Terrace Drive  
39 Dunwoody, GA 30338  
40

1 Joyce Hundley  
2 U.S. DEPARTMENT OF JUSTICE  
3 Antitrust Division  
4 1401 H Street N.W. #8000  
5 Washington, DC 20530

6 Andrew O. Isar  
7 TELECOMMUNICATIONS RESELLERS ASSOC.  
8 4312 92nd Avenue, NW  
9 Gig Harbor, WA 98335

10 Raymond S. Heyman  
11 ROSHKA, HEYMAN & DEWULF  
12 400 N. Van Buren, Ste. 800  
13 Phoenix, AZ 85004-3906

14 Thomas L. Mumaw  
15 SNELL & WILMER  
16 One Arizona Center  
17 Phoenix, AZ 85004-0001

18 Mike Allentoff  
19 GLOBAL CROSSING SERVICES, INC.  
20 1080 Pittsford Victor Road  
21 Pittsford, NY 14534

22 Michael Morris  
23 Allegiance Telecom of Arizona, Inc.  
24 505 Sansome Street, 20th Floor  
25 San Francisco, CA 94111

26 Gary L. Lane, Esq.  
6902 East 1st Street, Suite 201  
Scottsdale, AZ 85251

Kevin Chapman  
SBC TELECOM, INC.  
1010 N. St. Mary's, Room 1234  
San Antonio, TX 78215-2109

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26

Richard Sampson  
Z-TEL COMMUNICATIONS, INC.  
601 S. Harbour Island, Ste. 220  
Tampa, FL 33602

Megan Doberneck  
COVAD COMMUNICATIONS COMPANY  
7901 Lowry Boulevard  
Denver, CO 80230

Richard P. Kolb  
Vice President of Regulatory Affairs  
ONE POINT COMMUNICATIONS  
Two Conway Park  
150 Field Drive, Ste. 300  
Lake Forest, IL 60045

Attorney General  
OFFICE OF THE ATTORNEY GENERAL  
1275 West Washington  
Phoenix, AZ 85007

Steven J. Duffy  
RIDGE & ISAACSON, P.C.  
3101 North Central Ave., Ste. 1090  
Phoenix, AZ 85012

Karen Clauson  
ESCHELON TELECOM  
730 Second Avenue South, Ste. 1200  
Minneapolis, MN 55402

Curt Huttzell  
State Government Affairs  
Electric Lightwave, Inc.  
4 Triad Center, Suite 200  
Salt Lake City, UT 84180

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26

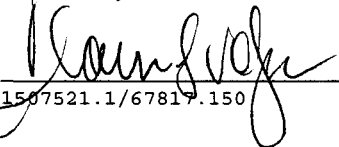
Brian Thomas  
Time Warner Telecom, Inc.  
223 Taylor Avenue North  
Seattle, WA 98109

David Kaufman  
ESPIRE Communications  
1129 Paseo De Peralta  
Santa Fe. NM 87501

Mitchell F. Brecher  
Greenberg Traurig, LLP  
800 Connecticut Avenue, NW  
Washington, DC 20006

Tobin Rosen  
Principal Asst. City Attorney  
Office of the Tucson City Attorney  
255 W. Alameda- Seventh Floor West  
Tucson, AZ 85701

Patrick A. Clisham  
AT&T Arizona State Director  
320 E. Broadmoor Court  
Phoenix, AZ 85022

  
1507521.1/67817.150



# EXHIBIT

# A

**EXHIBIT A**  
**HP & Staff SATE Recommendations**  
**(Paragraphs 146, 147, and 149 of OSS Order, Decision No. 66224)**  
**Status of Qwest Actions**

Title	Recommendation	Qwest Response to Recommendation and Action Taken	Status
<p><b>Originator</b></p> <p><b>Plan for CLEC SATE Testing Needs</b></p> <p><i>HP</i></p> <p><b>From Decision No. 66224 ¶146 (a)</b></p>	<p>1. Qwest submit a plan to ensure that it meets CLEC needs for testing of all products available in Arizona, including new technologies.</p>	<p><b>Met.</b></p> <p>Qwest currently has CMP forums and processes in place to address this recommendation:</p> <ul style="list-style-type: none"> <li>▪ Qwest is utilizing the CMP CR prioritization process to add new products to SATE.</li> <li>▪ Qwest has proactively added products or created CMP CRs to add products to SATE.</li> <li>▪ Qwest's published process is being used to identify and prioritize SATE additions SATE meets the needs of the CLEC community, and Qwest is committed to continue meeting CLECs' needs.</li> </ul> <p>Qwest's plan is still being used in the CMP with the following change being made for prioritization of SATE related CRs:</p> <p>For IMA release 12.0 and above, the only CRs that will be prioritized will be the CRs for adding products (or new IMA release independent functionality) to SATE. This is the result of the decision made by CLECs and Qwest in the CMP redesign process to automatically include as changes in SATE any changes that were prioritized for inclusion in IMA. A total of ten CRs, each for the inclusion of additional products in SATE, were prioritized for 12.0 SATE. At the December 2002 CMP meeting, three product CRs (pertaining to Centrex 21, Loop Splitting, and Line Splitting) were committed for inclusion in 12.0 SATE. These three products were deployed in 12.0 SATE on March 8, 2003. At the May, 2003 CMP meeting, two product CRs (pertaining to Qwest DSL, Service Order Status Inquiry and UNE-P Centrex 21) were committed for inclusion in 13.0 SATE. These three products were deployed in 13.0 SATE on July 18, 2003.</p>	<p><b>Completed.</b></p>

Title Originator	Recommendation	Qwest Response to Recommendation and Action Taken	Status
<p><b>SATE documentation QA and Release Mgmt Process</b></p> <p><i>HP</i></p> <p>From Decision No. 66224 ¶146 (b)</p>	<p>2. Qwest implement a quality assurance process and a release management practice specifically for the SATE documentation.</p>	<p><b>Met.</b></p> <ul style="list-style-type: none"> <li>Qwest externally published the guidelines that detail the release management, version control, and quality assurance processes that Qwest employs for the issuance of SATE documents. These guidelines are available on the Qwest Wholesale web site, within the SATE Data Document.</li> <li>Qwest's current documentation processes support the production of documents that enable CLECs to properly utilize SATE.</li> </ul>	<p><b>Completed.</b></p>
<p><b>SATE Roles &amp; Responsibilities, Internal Controls, Process Flow Documentation</b></p> <p><i>HP</i></p> <p>From Decision No. 66224 ¶146 (c)</p>	<p>3. To ensure continued adequacy of the SATE:</p> <p><input type="checkbox"/> That Qwest clearly and specifically identify the roles and responsibilities of each individual and organization involved in the SATE. This definition of roles and responsibilities should include goals and objectives and mission statements for each organization and for all personnel. In addition, the job description for each employee should be clearly defined</p> <p><input type="checkbox"/> That Qwest develop a system of internal controls to ensure accountability for organizations and individuals involved in the SATE process. These controls should use clearly defined goals and objectives and should tie specifically to functional responsibility, such as quality of documentation, accuracy of test account data, mirror image of production, etc. Employees involved in the SATE should be encouraged to accomplish these goals and objectives.</p>	<p><b>Met.</b></p> <ul style="list-style-type: none"> <li>Staffing Plan, Roles &amp; Responsibilities, Organizational Objectives/Accountabilities, and SATE Process Flow documentation published and maintained as part of Qwest's IMA EDI Implementation Guidelines</li> <li>Was initially published with version 9.0 of the guide, released on January 21, 2002</li> </ul>	<p><b>Completed.</b></p>

Title Originator	Recommendation	Qwest Response to Recommendation and Action Taken	Status
<p><b>Business Rules Variance List</b></p> <p><i>HP</i></p> <p>From Decision No. 66224 ¶146 (d)</p>	<p><input type="checkbox"/> That Qwest develop process flow documentation that accurately reflects actual SATE processes and is a reliable guide to CLECs using the SATE.</p> <p>4. Qwest publish a list of variances between SATE and production business edits to ensure that CLECs are fully aware of any such discrepancies so that a CLEC may effectively develop their business processes in this 'simulated' environment. This list should become a permanent part of the SATE documentation library.</p>	<p><b>Met.</b></p> <ul style="list-style-type: none"> <li>The Qwest IMA EDI Errors List contains all errors generated by the IMA system.</li> <li>Qwest established a list of all legacy system error messages coded into SATE</li> <li>Qwest provides a list of legacy system errors that are returned through Qwest's production EDI interface during the six-month period prior to the creation of the list. Qwest compares this list to the errors currently contained in SATE and publishes the variances.</li> <li>Qwest added the IMA BPL errors list into the single document for the other errors, and now one single variance list is published and available on the Qwest Wholesale Web Site</li> <li>With every new release of IMA, Qwest runs scripts against the production logs of the previous IMA release to gather the list of legacy systems errors messages encountered by the CLECs from the time the previous release was implemented until the time the new release is implemented. Each time the list is generated, Qwest then evaluates it against SATE, and establishes an updated list of variances.</li> </ul>	<p><b>Completed.</b></p>
<p><b>Formally incorporate SATE into CMP</b></p> <p><i>HP</i></p> <p>From Decision No. 66224 ¶146 (e)</p>	<p>5. HP recommends that Qwest formally incorporate the SATE into the CMP process, and future changes and modifications should be subject to that process and that Qwest develop a permanent, formalized method of obtaining CLEC input and identifying current</p>	<p><b>Met.</b></p> <p>SATE is subject to the CMP process. Qwest began the CLEC SATE Users' Group in early November 2001. SATE issues are part of each monthly Systems CMP Agenda. Documented results are included in each monthly meeting minutes. Changes are submitted via CMP CRs per the CMP process.</p>	<p><b>Completed.</b></p>

Title Originator	Recommendation	Qwest Response to Recommendation and Action Taken	Status
	and future SATE requirements in connection with the CMP process. This process should proactively seek CLEC evaluation of the SATE process, suggestions for improvement, and forecasts for testing requirements. HP also recommends that Qwest obtain input from the CLECs to determine the full suite of products that shall be included in the SATE.		
<p><b>SATE Available for New Release Testing</b></p> <p><i>HP</i></p> <p>From Decision No. 66224 ¶146 (f)</p>	<p>6. HP recommends that Qwest develop a formal process by which the SATE will be available for new release testing on an ongoing basis.</p>	<p><b>Met.</b></p> <p>Qwest has a formal documented process by which the SATE will be available for new release testing on an ongoing basis. This process became effective with Release 9.0 and requires that SATE be made available approximately thirty calendar days prior to a major production release. Qwest has made, and will continue to make, SATE available approximately thirty days in advance of a major release unless otherwise agreed to by all parties.</p>	<p><b>Completed.</b></p>
<p><b>SATE to be tested for Full Release Testing Availability</b></p> <p><i>HP</i></p> <p>From Decision No. 66224 ¶146 (g)</p>	<p>7. To ensure that the SATE is adequate for full release testing, HP recommends that 9.0 be tested. This release is expected to take place February 2002.</p>	<p><b>Met.</b></p> <p>HP performed this second evaluation and determined that "the Qwest SATE is adequate to support New Release Testing by a CLEC."</p>	<p><b>Completed.</b></p>
<p><b>PID for SATE</b></p> <p><i>HP</i></p> <p>From Decision No. 66224 ¶146 (h)</p>	<p>8. HP recommends that a SATE performance standard be developed for Arizona that addresses the need for Qwest to demonstrate that the SATE remains an adequate mirror image of production as OSS systems evolve. In reviewing this standard, the ACC may wish to</p>	<p><b>Met.</b></p> <p>Although Qwest had negotiated the current PO-19 PID with the CLECs, Qwest agreed to modify the PID to create a new PID submeasure (PO-19B) that would compare the execution of the same transactions in production and in SATE, in order to further measure the extent to which SATE mirrors production.</p>	<p><b>Completed.</b></p>

Title Originator	Recommendation	Qwest Response to Recommendation and Action Taken	Status
<p>Implementation Plan for HP Recommendations</p> <p>HP</p> <p>From Decision No. 66224 ¶146 (i)</p>	<p>9. HP recommends that Qwest file with the ACC an implementation plan for the above recommendations, which includes specific deliverables, milestones, and dates, no later than December 31, 2001.</p>	<p>PO-19 results have been included in Qwest's Arizona PID results since July 2002.</p> <p>Met.</p> <p>Qwest filed associated implementation plan on 12/28/01.</p>	<p>Completed.</p>
<p>Incorporate Closed-Unresolved Issues in SATE User's Group/CMP</p> <p>HP</p> <p>From Decision No. 66224 ¶147 (a)</p>	<p>10. All issues that have a status of "Closed-Unresolved" or "Open" as of the distribution of this document be incorporated into the SATE User Group and CMP process.</p>	<p>Met.</p> <p>Only one issue remained in Closed-Unresolved status, simply because Qwest fixed it after HP had finished its evaluation (HPSATEEV2032). The fix was to update the SATE data document for transaction FAQ18 to ensure the error message detailed in the Data Document matched the actual error message received when the transaction was executed. It wasn't necessary to take this issue to CMP or the SATE User's Group. Forum for resolution.</p> <p>Update: The FAQ18 transaction was subsequently changed to FAQ9 and the documentation was updated with the release 12.0 SATE Data Document on March 10, 2003.</p>	<p>Completed.</p>
<p>PO-19 Supporting Documentation</p> <p>HP</p> <p>From Decision No. 66224 ¶147 (b)</p>	<p>11. Supporting documentation be provided to more clearly clarify the calculations and measurement process of PID PO-19.</p>	<p>Met.</p> <p>The ACC Staff reached a decision on the PO-19B Impasse decision on January 6, 2003. The Staff provided an updated Impasse Resolution document on February 27, 2003, at Qwest's request, to further clarify that both items at impasse (the PO-19B PID definition and the inclusion of products in SATE) were resolved based on Qwest's proposals.</p> <p>PO-19 PID issues have been finalized. The PID will be processed through LTPA.</p>	<p>Completed.</p>

Title Originator	Recommendation	Qwest Response to Recommendation and Action Taken	Status
<p>Negative Testing</p> <p><i>HP</i></p> <p>From Decision No. 66224 ¶147 (c)</p>	<p>12. Qwest should consider asking CLECs to submit data requests for negative scenarios and BPL edits for key transactions. Qwest provide a clearly defined process to ensure timely resolution of production mirror issues encountered by CLECs during post SATE certification.</p>	<p><b>Met.</b></p> <p>Because the CMP participants indicated their desire for this issue to be presented to the SATE Users Group, Qwest discussed this with that group at its 5/21/02 meeting. The CLECs were not interested in further negative testing being added to the Data Document, recognizing that they can submit requests at any time to have additional scenarios added.</p>	<p><b>Completed.</b></p>
<p>Business Rule Changes Scenarios</p> <p><i>HP</i></p> <p>From Decision No. 66224 ¶147 (d)</p>	<p>13. Qwest include scenarios in data document reflecting all business rule changes identified in the New Release change summary documentation.</p>	<p><b>Met.</b></p> <ul style="list-style-type: none"> <li>Qwest implemented this recommendation based upon the candidates for a release, instead of each individual change in the change summary, obtaining CLEC input in the 5/21/02 User's Group to do so.</li> <li>The candidates for a release encompass all of the major changes. Once the release candidate list is available for the upcoming release, Qwest will provide this list to the CLECs through CMP. In the Data Document for the new release, Qwest will identify which associated existing test scenario will appropriately test each SATE release candidate. In the cases where a new candidate does not yet have an associated SATE test transaction, Qwest will create a new transaction and provide that information to the CLECs as well.</li> <li>Any new transaction will be included in the new section of the data document. CLECs can elect to run these transactions to complete their re-certification testing requirements. If they do not plan to use the new functionality provided by a candidate, CLECs can use the existing transaction for the product and activity. The candidate review section of the data document will be specific to a release of the document.</li> </ul>	<p><b>Completed.</b></p>

Title Originator	Recommendation	Qwest Response to Recommendation and Action Taken	Status
<p>Negative Testing</p> <p>ACC</p> <p>From Decision No. 66224 ¶149 (c)</p>	<p>14. Qwest should be required to immediately enhance the range of capabilities available in SATe to provide for negative testing by CLECs.</p>	<p>Met.</p> <p>Same as #13.</p>	<p>Completed.</p>
<p>Quarterly Status Reports</p> <p>ACC</p> <p>From Decision No. 66224 ¶149 (f)</p>	<p>15. Qwest should be required to report to the Commission on a quarterly basis, the status of its progress in implementing the recommendations of Staff and HP.</p>	<p>Met.</p> <p>Qwest complied with this Recommendation. The first quarterly status report was submitted on 6/28/02, and was followed by subsequent quarterly status reports, with the final report being filed in March 2003. No further status reports have been filed since all recommendations were met at that time.</p>	<p>Completed.</p>
<p>Incorporate Error Codes &amp; Variances into a single file</p> <p>ACC</p> <p>From Decision No. 66224 ¶149 (g)</p>	<p>16. Qwest should immediately implement HP's recommendation that it publish a single document, to be maintained throughout the life of SATe as the IMA-EDI production and SATe environments as updated, that is inclusive of SATe Legacy and BPL Error Codes and Production vs. SATe differences. This document will provide a CLEC with a single location to review the details regarding all error codes and variances that exist between SATe according to the schedule suggested by Qwest of twice per EDI Release at a minimum.</p>	<p>Met.</p> <p>One single variance list is now published on the Wholesale website, effective May 23, 2002.</p> <p>With the IMA 13.0 implementation, Qwest began providing a list of all IMA-generated errors, all legacy system errors seen in production in the six months prior to the release, all legacy system errors coded into SATe (beginning with IMA release 9.0), and a variance analysis to communicate to the CLECs which production legacy system errors cannot be found in SATe. An updated IMA Errors List is developed for and accompanies each EDI release. Additionally, Qwest provides a change summary that references any error that has changed from one release to the next for the legacy system errors seen in production, the legacy system errors coded into SATe, and the IMA-generated errors.</p>	<p>Completed.</p>



**EXHIBIT**

**B**

**EXHIBIT B**  
**CGE&Y & Staff Recommendations**  
**(Paragraphs 145, 148, and 151 of OSS Order, Decision No. 66224)**  
**Status of Qwest Actions**

Title	Recommendation	Qwest Response to Recommendation and Action Taken	Status
<p><b>Originator</b></p> <p><b>Gain CLEC Approval Before Changing CLEC Accounts</b></p> <p><b>CGE&amp;Y</b></p> <p><b>From Decision No. 66224</b></p> <p><b>¶145 (a)</b></p>	<p>1. Qwest should develop a process to seek and receive approval from a CLEC before performing any changes to a CLEC-owned account. Currently, Qwest initiated activities are shown as "Completions" on a Loss and Completion Report, but little detail is provided, causing undue confusion. Implementation of this recommendation may provide an opportunity for Qwest to improve the quality and value of the Loss and Completion Report that Qwest provides to CLECs. Notification to a CLEC indicating that Qwest-initiated changes have been made would potentially facilitate the reconciliation of the Loss and Completion Report. This recommendation was developed to address the issue of late notification of order completion on the Loss and Completion Report, and is discussed further in AZIWO2115. This issue is an appropriate candidate for review by the CMP.</p>	<p><b>Met:</b></p> <p>Qwest made a change to the Loss and Completion Report that satisfies this recommendation.</p> <p><b>PON Now Indicates Qwest Initiated Change</b></p> <p>On March 16, 2002, Qwest modified the SOPs so that the PON is automatically populated with a value indicating Qwest initiated the order. This PON is reflected on the Loss and Completion Report. This facilitates CLECs in reconciling L/C report as CGE&amp;Y recommends.</p> <p>Qwest notified the CLEC community of the March change on February 21, 2002.</p>	<p><b>Completed.</b></p>
<p><b>Including Additional Edits of LSRs Within the BPL</b></p> <p><b>CGE&amp;Y</b></p> <p><b>From Decision No. 66224</b></p> <p><b>¶145 (b)</b></p>	<p>2. CGE&amp;Y recommends that Qwest explore the inclusion of additional edits of CLEC LSRs, within the Business Process Layer (BPL) of the gateway systems, prior to issuance of a FOC. This recommendation suggests that</p>	<p><b>Met:</b></p> <p>Qwest is continually enhancing IMA by adding additional LSR edits to improve processing efficiency and reduce errors.</p> <p><b>Additional Details:</b></p>	<p><b>Completed.</b></p>

Title	Originator	Recommendation	Qwest Response to Recommendation and Action Taken	Status
Improve System Table Updates and Communication to Work Centers  <b>CGE&amp;Y</b> From Decision No. 66224 ¶145 (c)	3. CGE&Y recommends that when service introduces a new product or account, that the appropriate CLEC and process changes are communicated to the appropriate Qwest departments or work centers. This recommendation suggests that Qwest implement process improvements that would result in a more efficient update of system tables and better communication to work centers, which would help ensure efficient processing of CLEC orders. This issue is discussed in AZIWO1134, which allows CLEC to take advantage of new and revised product offerings more expeditiously. It is also discussed in AZIWO1127, which refers to software changes that were outside of a scheduled IMA release that were not communicated to the CLECs.	increased edits in Qwest gateway OSS would likely result in lowered initial LSR rejection rates, improved CLEC order processing, and the reduction of rejects after a FOC. This issue was initially discussed in AZIWO2116, and Qwest has implemented improvements.	Qwest implemented two changes in Release 10.0; eight changes were implemented in Release 11.0, two changes were implemented in Release 12.0, and three changes were implemented in Release 13.0.	
Improve Timeliness of Record Updates  <b>CGE&amp;Y</b> From Decision No. 66224 ¶145 (d)	4. CGE&Y recommends that, through the CMP, Qwest improve the timeliness of record updates from Qwest's provisioning systems to the various downstream OSS in regard to customer conversions wherever such improvements have not already been put in place. Delays in	<b>Met:</b> Specific complaint from CLECs is that CSR updates take too long. Qwest updates the vast majority of CSRs within a 3-to-5 day interval. This interval is the same for both Wholesale and Retail accounts.	<b>Additional Details:</b> <b>Table Updates</b> - Implemented improvements: rate sign-off sheet for departmental approval; peer-to-peer review of rates; 3 <sup>rd</sup> Q of 2002 implementation of automated tool to load rates from CPS to CRIS. <b>Work Centers</b> - A methods-and-procedure walk-through is conducted with the impacted organizations prior to the effective date that new or enhanced products or processes are introduced. Details are posted on Qwest's internal web site for reference by work center personnel.	<b>Completed.</b>

Title Originator	Recommendation	Qwest Response to Recommendation and Action Taken	Status
	<p>downstream record updates can potentially add additional steps to CLECs' business processes. This recommendation is based on AZIWO2060, which is discussed on page 76 of this report.</p>	<p>AT&amp;T submitted a CR through the CMP that would require CSRs to be updated within 24 hours. Qwest completed a work effort estimate, discussed in the July 8, 2002 CMP meeting, for alternative solution. CLEC community expressed no support for the effort. CR status changed to "denied". Subsequently, another CR was submitted, prioritized and implemented. In this implementation, Qwest streamlined the process in Release 12.0 that CLECs follow when subsequent changes are needed prior to CSR updates.</p>	
<p><b>Process Improvements to CLEC-initiated Orders, Review of Order Status and Improvements to SIG.</b></p> <p><i>CGE&amp;Y</i></p> <p>From Decision No. 66224 ¶145 (e)</p>	<p>5. CGE&amp;Y recommends that the CMP consider the following process improvements:</p> <p>a) Qwest provide the CLECs with a complete listing of the services and features on any CLEC-initiated order, as entered in Qwest's Service Order Processor (SOP). This recommendation should apply for any CLEC order type, whether flow-through or non-flow-through. This recap should include information such as USOCs, FIDs, Hunting Sequence, etc. This suggestion calls for the Service and Equipment (S&amp;E) section of the Service Order to be returned to the CLEC as entered in the Qwest SOP. This is currently under evaluation by the CMP.</p> <p>b) Explore and develop an automated process that would allow CLECs to view the status of service orders initiated by Qwest on CLEC owned accounts. This recommendation suggests that CLECs be provided with the opportunity to view orders, determine the status of orders, and</p>	<p><b>Met:</b></p> <p>a) CR was implemented in 10.1 (August 19, 2002). This implemented "SOP Pending Notice" for IMA-GUI and "Pending Svc Ord Notice" for EDI.</p> <p>b) Same as Recommendation #1.</p>	<p><b>Completed.</b></p>

Title Originator	Recommendation	Qwest Response to Recommendation and Action Taken	Status
	<p>monitor the progress of those orders through the Qwest OSS so that CLECs can more effectively support the needs of their end users.</p> <p>c) Continue to improve the Service Interval Guide (SIG) to provide clearer and more detailed information for CLECs on disconnect intervals, and to make the information easier to locate on the Qwest wholesale web site.</p>	<p>c) Qwest - provided additional clarity in the SIG and presented changes to CLEC community. Specifically, changes were added to the "disconnect" portion of the general section. Qwest also added lists of products that carry the same-day, 3-day and 5-day disconnect intervals.</p>	
<p><b>Providing CLECs 45-day Notice of Final EDI Design Documentation</b></p> <p><i>CGE&amp;Y</i></p> <p>From Decision No. 66224 ¶145 (f)</p>	<p>6. CGE&amp;Y recommends that Qwest provide CLECs a 45-calendar day advance notice of final EDI design documentation. This recommendation simply suggests that Qwest conform to the timelines for issuance of EDI design documents, as presented by the CMP Redesign Team. The basis for this recommendation can be found in the Relationship Management Evaluation section of this report on page 395, as well as in the CGE&amp;Y report Qwest Change Management Process Redesign Evaluation, Version 3.0, page 43.</p>	<p><b>Met:</b></p> <p>Qwest fully implemented this process with IMA 10.0. The final technical specifications are also distributed to CLECs 45 days prior to implementation of release.</p>	<p><b>Completed.</b></p>
<p><b>Update Wholesale Web Site Clarifying Use of FOCs and Error Messages</b></p> <p><i>CGE&amp;Y</i></p> <p>From Decision No. 66224 ¶145 (g)</p>	<p>7. a) CGE&amp;Y recommends that Qwest update their Wholesale web site with clear standards and business rules pertaining to CLECs use of the FOC. These standards/business rules should clearly articulate how a CLEC is to differentiate FOC, Jeopardy notice, Reject notices, and any/all other notifiers. b) CGE&amp;Y also recommends that Qwest publish standard error-handling information and provide it</p>	<p><b>Met:</b></p> <p>Both changes were implemented and reside on the Qwest Wholesale web site.</p> <p>The FOC White Paper, which includes the Error Notice matrix, was formally posted to the web site on July 8, 2002. Prior to that date, the FOC White Paper was on the web site in a Word document.</p>	<p><b>Completed.</b></p>

Title Originator	Recommendation	Qwest Response to Recommendation and Action Taken	Status
	to CLECs on the wholesale web site in a table format. This would include more detailed information on Non-Fatal and Fatal errors, making the wholesale web site a more detailed and complete reference point for CLECs. Although the Qwest White Paper "Firm Order Confirmation Evaluation Results," dated August 6, 2001 provides guidance, the continued development of reference material to assist the CLECs in distinguishing and preventing errors would benefit all parties. The issue of distinguishing error messages is also discussed in Appendix R of this report, Arizona §271 Performance Indicator Definitions (PID) Data Elements Summary Reports, specifically in the HP Missing Functionality Data Elements Spreadsheet.		
<p><b>Improve Process for CLECs to Reserve Large Blocks of TNs</b></p> <p><i>CGE&amp;Y</i></p> <p><b>From Decision No. 66224 ¶145 (h)</b></p>	<p>8. CGE&amp;Y recommends that Qwest improve the process for CLECs to reserve large blocks of TNs. The reservation of large blocks of TNs is currently a manual process for CLECs. A process improvement, through mechanization or other means, would be most beneficial to CLECs when servicing business customers. The basis for this recommendation is discussed in the Retail Parity Evaluation section of this report on page 236, and in Data Request 192.</p>	<p><b>Met:</b></p> <p>In January 2002, Qwest adjusted the manual process for CLECs to obtain large blocks of telephone numbers. CLECs have the option of holding while the ISC contacts the Numbering Services Administration Center ("NSAC"). After the ISC obtains the numbers, the CLEC is given the option of receiving the telephone numbers via fax, via email or verbally on the same call.</p>	<b>Completed.</b>
<p><b>Reduce IMA-GUI Input Steps</b></p> <p><i>Staff</i></p>	<p>9. Qwest should assess system improvements for reducing the IMA-GUI input steps required by CLECs. This effort should be</p>	<p><b>Met:</b></p> <p>Discussed in the CMP meeting in June 2002. Parties discussed 10 CR's to be prioritized in upcoming IMA releases.</p>	<b>Completed.</b>

Title	Recommendation	Qwest Response to Recommendation and Action Taken	Status
<b>Originator</b> From Decision No. 66224 ¶148 (a)	conducted in conjunction with other system changes.	<b>Update:</b> <ul style="list-style-type: none"> <li>Six CRs were implemented in Release 12.0</li> <li>One CR was implemented in Release 13.0</li> <li>Three CRs were ranked 19<sup>th</sup>, 29<sup>th</sup> and 39<sup>th</sup> out of 53 for Release 14.0, and then were ranked 33<sup>rd</sup>, 35<sup>th</sup>, and 39<sup>th</sup> out of 57 for Release 15.0. These three CRs are in a Pending Prioritization status for Release 16.0.</li> </ul>	
Provide CLECs with Ad-Hoc Data for Performance Measurement Calculations <i>Staff</i> From Decision No. 66224 ¶148 (b)	10. Qwest should agree to provide CLECs the ability to request ad-hoc data for performance measurement calculations for PIDs contained in the PAP. This would provide the most effective method for auditing the performance results provided by Qwest.	<b>Met:</b> Qwest has implemented this ad hoc request process. It is included in the Arizona SGAT in Exhibit K.	<b>Completed.</b>
Conduct Another DUF Test <i>CGE&amp;Y</i> From Decision No. 66224 ¶148 (c)	11. Qwest should test its Daily Usage File (DUF) provisioning to CLECs to ensure accurate and timely delivery of these records. This test should be conducted within 12 months and be conducted with Staff oversight.	<b>Qwest will comply with this Recommendation.</b>	<b>Open.</b>
ACC to Address Wholesale Service Standards for Qwest <i>Staff</i> From Decision No. 66224 ¶148 (d)	12. The ACC should initiate a proceeding to develop and implement Wholesale Service Standards for Qwest.	<b>Qwest did not oppose Recommendation but reserves the right to advocate positions in favor of or in opposition to any issue that may arise.</b>	<b>No action required.</b>
Monthly CMP Re-Design Status Reports <i>Staff</i>	13. CMP: Qwest should continue to submit a monthly report on the status of its change management process Re-Design.	<b>Met:</b> Monthly status reports were submitted beginning October 2001. The August 2002 report was filed on September 18, 2002 so that it could incorporate status	<b>Completed.</b>

Title	Recommendation	Qwest Response to Recommendation and Action Taken	Status
<p><b>Originator</b></p> <p>From Decision No. 66224 ¶151 (a)</p>		<p>from the September 12-13, 2002 CMP Re-Design meeting. The Re-Design process was then completed and this requirement was met, therefore, no further monthly Re-Design reports were filed.</p> <p>A final Re-Design meeting was held on November 14, 2002. In that meeting, the parties reviewed the finalized Qwest Wholesale Change Management Process document and completed the CMP Redesign effort. All parties approved the Re-Design effort and agreed that in the future if any participant wanted a change made to the process a CR to change the document could be submitted to the CMP.</p>	
<p><b>Qwest to Submit Quarterly CMP Re-Design Report</b></p> <p><i>Staff</i></p> <p>From Decision No. 66224 ¶151 (b)</p>	<p>14. CMP: Qwest should develop a report on the effectiveness of the Re-Designed Change Management Process. This report should include but not be limited to: a listing of CRs submitted and the submitting party, a listing of Qwest v. CLEC CRs submitted; a listing of the issues escalated and those taken to dispute resolution and the resolution reached, summary of the disposition of all system, product and process changes, status report on CLEC requested changes, and the proportion of CLEC changes to ILEC changes to OSS systems, products and process ultimately reflected in each release. It will report on the effectiveness of the interim processes for each Qwest release and whether the processes are working as anticipated. This report should be furnished to the ACC on a quarterly basis.</p>	<p><b>Qwest is complying with this Recommendation.</b></p> <p>The first quarterly report was submitted on August 8, 2002. The most recent report was submitted in January 2004 for the fourth quarter of 2003.</p>	<p><b>Ongoing.</b></p>
<p><b>Compliance Filing</b></p> <p><i>Staff</i></p>	<p>15. CMP: Qwest should immediately submit a verification filing which more fully demonstrates its compliance with all of the processes</p>	<p><b>Met:</b></p> <p>Qwest complied with this recommendation by filing its Qwest's Verification of Compliance with its Change</p>	<p><b>Completed.</b></p>



Title Originator	Recommendation	Qwest Response to Recommendation and Action Taken	Status
<p>From Decision No. 66224 ¶151 (c)</p>	<p>and procedures set forth in its Master Red-Lined CLEC-Qwest CMP Re-Design Framework since implementation of the various processes and procedures. Any variances should be accompanied with an explanation for the discrepancy.</p>	<p>Management Process on May 10, 2002.</p>	
<p>PCAT/Tech Pub Updates  Staff From Decision No. 66224 ¶151 (d)</p>	<p>16. CMP: Qwest should be required to submit verification that it has updated its PCAT and Technical Publications so that they are all consistent with the Statement of Generally Available Terms and Conditions (SGAT). To the extent there is no timeframe for such updates in the SGAT, Staff recommends that Qwest include a timeframe for changes in the future.</p>	<p>Met: Qwest complied with this recommendation by filing its Qwest's Verification of Compliance with its Change Management Process on May 10, 2002.</p>	<p>Completed.</p>
<p>Provision for State Commissions' Input to CMP  Staff From Decision No. 66224 ¶151 (e)</p>	<p>17. CMP: Qwest and the CLECs should incorporate into the Red-Lined Master Red-Lined Agreement express provision for participation by State Commissions in the process which gives the Commission Staffs an opportunity to offer input into the process, without any binding effect on the respective Commission should a dispute later arise which is taken to the Commission for resolution.</p>	<p>Met: The redesign team reached agreement on this in the July 26, 2002 meeting. The following language was added to Section 1.0 Scope: "Any opinions expressed at the CMP meetings by representatives of government agencies such as state Public Utilities Commissions (PUC), Federal Communications Commission (FCC), and the Department of Justice (DOJ) do not bind such government agencies."</p>	<p>Completed.</p>